

**Brian D. Whelan, Esq. (SBN 256534)**  
**WHELAN LAW GROUP, A Professional Corporation**  
**1827 East Fir Avenue, Suite 110**  
**Fresno, California 93720**  
**Telephone: (559) 437-1079**  
**Facsimile: (559) 437-1720**  
**E-mail: [brian@whelanlawgroup.com](mailto:brian@whelanlawgroup.com)**

Attorneys for: Plaintiff JOEI HARRISON

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

JOEI HARRISON,

Plaintiff,

v.

PLANASA, LLC , et al.,

Defendant(s).

Case No. 2:20-CV-01104-WBS-DMC

**STIPULATION ALLOWING  
PLAINTIFF TO FILE AND SERVE  
HER FIRST AMENDED  
COMPLAINT; AND ORDER  
THEREON**

WHEREAS, through counsel, Plaintiff JOEI HARRISON (“Plaintiff”) has discussed with counsel for Defendants PLANASA, LLC and PLANASA US HOLDINGS (“Defendants”) the need to file a first amended complaint to address changes to the law impacting the complaint and a corresponding need to bring a motion to obtain an order granting leave to file a first amended complaint;

WHEREAS, the parties through their counsel have met and conferred over the proposed amendment and wish to avoid the time, trouble and expense associated with a motion for leave to file the amended pleading, and the parties have therefore agreed to the following stipulation:

**STIPULATION:**

In consideration of all of the above, the parties to this action hereby stipulate and agree that Plaintiff may file and serve her First Amended Complaint attached hereto as Exhibit "A" and that Defendants shall have the statutory time period with which to respond in any code-of-civil-procedure compliant manner.

Dated: October 9, 2020

WHELAN LAW GROUP,  
A Professional Corporation

/s/ Brian D. Whelan  
By Brian D. Whelan,  
Attorneys for Plaintiff JOEI HARRISON

Dated: October 9, 2020

WELLS, SMALL, FLEHARTY & WEIL


/s/ Mark Alan Vegh  
By Mark Alan Vegh,  
Attorneys for Defendants PLANASA, LLC and  
PLANASA US HOLDINGS, LLC

**ORDER**

Pursuant to the stipulation of the parties and good cause appearing therefor,

IT IS HEREBY ORDERED that Plaintiff may file and serve the proposed First Amended Complaint within 10 days of the Court's execution of this order and Defendants shall have the statutory period of time with which to respond in any code-of-civil-procedure compliant manner.

Dated: November 6, 2020

  
WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE